

EXHIBIT E

Julie R. Trotter, Bar No. 209675
jtrotter@calljensen.com
Kent R. Christensen, Bar No. 253815
kchristensen@calljensen.com
Delavan J. Dickson, Bar No. 270865
ddickson@calljensen.com
CALL & JENSEN
A Professional Corporation
610 Newport Center Drive, Suite 700
Newport Beach, CA 92660
Tel: (949) 717-3000
Fax: (949) 717-3100

Attorneys for Defendant 7-Eleven, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

EDUARDO MUNOZ, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

7-ELEVEN, INC., a Texas corporation,

Defendant.

Case No. 2:18-cv-03893 RGK (AGR)

**DEFENDANT 7-ELEVEN, INC.'S
PRIVILEGE LOG AS OF JANUARY
29, 2019**

Complaint Filed: May 9, 2018
First Am. Comp. Filed: July 9, 2018
Trial Date: July 2, 2019

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendant 7-Eleven, Inc. hereby provides the below privilege log noting the documents that it is withholding solely on the grounds of there being an applicable privilege save for communications that have taken place between counsel of record following the initiation of this lawsuit. These latter communications have not been included on the log as such communications are clearly privileged and it would be unduly burdensome and oppressive to require all such communications be reflected in a privilege log.

This log will be updated to the extent additional documents are withheld on the grounds of privilege.

Date of Document	Description of Document	Privilege Claimed
April and May, 2013	Email chain being produced but with redactions of communications in email chain between outside counsel and 7-Eleven employees, including its in-house counsel. As a review of the email chain produced shows, the non-privileged portion of this email chain is the initial email.	Attorney-client privilege
September 2015 email correspondence	Email chain between 7-Eleven employees and inhouse counsel. All correspondences in chain include 7-Eleven in-house counsel.	Attorney-client privilege

Date of Document	Description of Document	Privilege Claimed
March through May, 2016	Email chain between 7-Eleven employees and outside counsel. All correspondences include outside counsel and 7-Eleven in-house counsel.	Attorney-client privilege
March 2017	Email chain between 7-Eleven employees and outside counsel. All correspondences include outside counsel and 7-Eleven in-house counsel.	Attorney-client privilege
Late July and Early August, 2017	Email chain between 7-Eleven's in-house counsel and 7-Eleven employee Kristin Cope. All correspondence being withheld includes in-house counsel.	Attorney-client privilege
August 2017	Email chain between 7-Eleven employees and outside counsel. All correspondences include outside counsel and 7-Eleven in-house counsel.	Attorney-client privilege
December 1, 2017	Email chain internal to 7-Eleven initiated at the direction of outside counsel by the 7-Eleven employee who initiated the correspondence.	Attorney-client privilege

Date of Document	Description of Document	Privilege Claimed
February 2018	Email is being produced with redactions of information on third parties.	Third Party privacy rights.
February 9, 2018	Email is being produced with redactions of information on third parties.	Third Party privacy rights.
April 2018 email correspondence	Email chain between 7-Eleven employees and inhouse counsel. All correspondences in chain include 7-Eleven in-house counsel or note email sent is at direction of counsel.	Attorney-client privilege
April 9, 2018	Communications between 7-Eleven, Inc.'s outside counsel and 7-Eleven employees – including in-house counsel for 7-Eleven.	Attorney-client privilege.
August 2018 email correspondence	Email chain between 7-Eleven employees and inhouse counsel. All correspondences in chain include 7-Eleven in-house counsel.	Attorney-client privilege

Dated: January 29, 2019

CALL & JENSEN
A Professional Corporation

By: 

Julie R. Trotter

Attorneys for Defendant 7-Eleven, Inc.

CERTIFICATE OF SERVICE
(United States District Court)

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 610 Newport Center Drive, Suite 700, Newport Beach, CA 92660.

On January 29, 2019, I have served the foregoing document described as **DEFENDANT 7-ELEVEN, INC.'S PRIVILEGE LOG AS OF JANUARY 29, 2019** on the following person(s) in the manner(s) indicated below:

SEE ATTACHED SERVICE LIST

☐ (BY ELECTRONIC SERVICE) I am causing the document(s) to be served on the Filing User(s) through the Court's Electronic Filing System.

☐ (BY MAIL) I am familiar with the practice of Call & Jensen for collection and processing of correspondence for mailing with the United States Postal Service. Correspondence so collected and processed is deposited with the United States Postal Service that same day in the ordinary course of business. On this date, a copy of said document was placed in a sealed envelope, with postage fully prepaid, addressed as set forth herein, and such envelope was placed for collection and mailing at Call & Jensen, Newport Beach, California, following ordinary business practices.

☐ (BY OVERNIGHT SERVICE) I am familiar with the practice of Call & Jensen for collection and processing of correspondence for delivery by overnight courier. Correspondence so collected and processed is deposited in a box or other facility regularly maintained by the overnight service provider the same day in the ordinary course of business. On this date, a copy of said document was placed in a sealed envelope designated by the overnight service provider with delivery fees paid or provided for, addressed as set forth herein, and such envelope was placed for delivery by the overnight service provider at Call & Jensen, Newport Beach, California, following ordinary business practices.

☐ (BY FACSIMILE TRANSMISSION) On this date, at the time indicated on the transmittal sheet, I transmitted from a facsimile transmission machine, which telephone number is (949) 717-3100, the document described above and a copy of this declaration to the person, and at the facsimile transmission telephone numbers, set forth herein. The above-described transmission was reported as complete and without error by a


1 properly issued transmission report issued by the facsimile transmission machine upon
2 which the said transmission was made immediately following the transmission.

3 ☒ (BY E-MAIL) I transmitted the foregoing document(s) by e-mail to the
4 addressee(s) at the e-mail address(s) indicated.

5
6 ☐ (FEDERAL) I declare that I am a member of the Bar and a registered Filing User
7 for this District of the United States District Court.

8 ☒ (FEDERAL) I declare that I am employed in the offices of a member of this
9 Court at whose direction the service was made.

10 I declare under penalty of perjury under the laws of the United States of America
11 that the foregoing is true and correct, and that this Certificate is executed on January 29,
12 2019, at Newport Beach, California.

13
14 
15 Tabitha Muncey
16
17
18
19
20
21
22
23

SERVICE LIST

Mike Arias, Esq.

Attorneys for

Alfredo Torrijos, Esq.

ARIAS SANGUINETTI WANG & TORRIJOS, LLP

6701 Center Drive West, 14th Floor

Plaintiff Edwardo Munoz

Los Angeles, CA 90045

Tel: (310) 844-9696

Fax: (310) 861-0168

mike@asstlawyers.com

alfredo@asstlawyers.com

Steven L. Woodrow [*Admitted Pro Hac Vice*]

Patrick H. Peluso [*Admitted Pro Hac Vice*]

Taylor T. Smith [*Admitted Pro Hac Vice*]

WOODROW & PELUSO, LLC

3900 East Mexico Avenue, Suite 300

Denver, CO 80210

Tel: (720) 213-0675

Fax: (303) 927-0809

swoodrow@woodrowpeluso.com

ppeluso@woodrowpeluso.com

tsmith@woodrowpeluso.com